

EXHIBIT "A"

Exhibit to 30(b)(6) Notice of Deposition of Forest Electric Corporation

In accordance with Rule 30(b)(6), **Defendant Forest Electric Corporation** is requested to provide witnesses competent to testify with respect to the following issues and matters:

1. All discussions, negotiations, correspondence, and communication with regard to the formulation of any contract between Creedon Controls, Inc. and Banc One Building Corporation and/or Forest Electric Corporation, and which relate to the Banc One Core Data Center in Wilmington, Delaware;
2. All discussions, negotiations, correspondence, agreements and communications by and between Banc One Building Corporation and Forest Electric Corporation and/or its affiliates or subsidiaries, and with respect to the rights, responsibilities, and duties of the defendants and Plaintiff for the construction of the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
3. Any discussions, negotiations, or communications between this defendant and Tishman Construction Corporation, or any of its subsidiaries and affiliates, relating to the contractual obligations of Tishman Construction Corporation, Banc One Building Corporation, and/or Forest Electric Corporation, relating to the Banc One Core Data Center in Wilmington, Delaware.